

REMARKS

Favorable reconsideration and allowance of the subject application are respectfully requested. Claims 6-8 and 17-22 are pending in the present application, with claims 6, 7, 17 and 22 being independent.

Information Disclosure Statement

An Information Disclosure Statement and accompanying PTO-1449 form were filed on September 4, 2001. There is presently no indication that the Examiner considered the documents identified in that Information Disclosure Statement. Accordingly, the Examiner is respectfully requested to acknowledge consideration of the documents identified in that Information Disclosure Statement by initialing the PTO-1449 form and returning a copy of the initialed form to the undersigned.

Drawings

The Examiner objected to Figs. 4, 5, 11 and 14, stating the figures are not descriptive. Applicants submit herewith a Drawing Correction Authorization Request, labeling Figs. 4, 5, 11 and 14. Furthermore, Applicants labeled Figs. 29 and 30 as "Conventional Art." Accordingly, Applicants respectfully request that the

Examiner withdraw the objection.

Claim Rejections Under 35 U.S.C. §103

The Examiner rejected: claims 6-8 under 35 U.S.C. §103(a) as being unpatentable over *Newman et al.* (US 5,208,911) and further in view of *Trueblood* (US 5,463,702). This rejection is respectfully traversed insofar as it pertains to the presently pending claims.

Newman et al. is directed to a method and apparatus for storing and communicating a transformed definition, which includes sample values representing an input/output relation of an image transformation. The Examiner alleges on page 2 of the outstanding Office Action that *Newman et al.* generates a multidimensional lookup table, which is produced by a color characteristic description apparatus, and cites col. 3, lines 10-20 of *Newman et al.* for support thereof. Applicants respectfully submit that the "multidimensional grid table" (of *Newman et al.*) ***is not synonymous*** with a "multidimensional lookup table" as recited in the independent claims.

The "multidimensional grid table" is defined in *Newman et al.* in col. 3, lines 12-14 as containing sample vales of a composite transform definition, e.g. the apparatus transforms image data from

RGB to $L^*U^*V^*$. Whereas the "multidimensional lookup table" of the present invention incorporates a LUT (look up table) composed of an input and an output at each of the grid points formed by equally dividing the input side axis, see page 18, lines 14-17. In other words a multidimensional LUT must incorporate a large number of pairs of inputs and outputs (see the paragraph bridging pages 18-19). This LUT is composed of characteristic points adapted to the color characteristic of the digital camera, which has been measured by a colorimeter, see page 16, lines 21-23 of the present application. As such, the present invention compresses a "multidimensional lookup table" so as to reduce a load on table communication, as shown for example in Fig. 16 of the present invention, and does not compress a "multidimensional grid table" as defined in *Newman et al.*

Applicants recognize that examiners give claims their broadest reasonable interpretation in light of the supporting disclosure during prosecution (as specified, for example, in MPEP 2106), the guideline for examination does not permit disregarding words/limitations in the claims. Furthermore, during patent examination, the pending claims must be interpreted consistent with the specification, see *In re Prater*, 514, F.2d 1393, 1404-05, 162 USPQ 541, 550-51 (CCPA 1969). Additionally, in order to establish

a *prima facie* case of obviousness, three basic criteria must be met: (1) there must be some suggestion of motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings; (2) there must be a reasonable expectation of success; and (3) the prior art reference must teach or suggest all the claim limitations, see *In re Vaeck*, 947 F.2d 48, 20 USPQ2d 1438 (Fed.Cir.1991).

Therefore, because *Newman et al.* does not produce a "multidimensional lookup table" as recited in the independent claims, the Examiner has failed to establish a *prima facie* case of obviousness.

Additionally, the Examiner acknowledges on page 3 of the outstanding Office Action that *Newman et al.* does not disclose compression of a multidimensional lookup table and cites *Trueblood* for support thereof.

Trueblood is directed to a method and apparatus for performing color compression that uses human factors in order to represent colors in an original image. *Trueblood*, however, either alone or in combination with *Newman et al.* (which combination Applicants do not admit) also fails to make up for the previously mentioned deficiencies of *Newman et al.* Therefore, because the Examiner has

failed to establish a *prima facie* case of obviousness, Applicants respectfully request that the Examiner withdraw the rejection.

Added independent claims 17 (including dependent claims 18-21) and 22 should be considered allowable at least because the cited prior art fails to teach or suggest the combination of elements including an identifier for identifying a restoring method for restoring the compressed multidimensional lookup table.

Conclusion

In view of the above amendments and remarks, this application appears to be in condition for allowance and the Examiner is, therefore, requested to reexamine the application and pass the claims to issue.

Pursuant to 37 C.F.R. §§ 1.17 and 1.136(a), Applicants hereby petition for an extension of time for two (2) month(s) to March 3, 2003, for filing a reply to the Office Action dated October 3, 2003, in connection with the above-identified application.

Attached hereto is a marked-up version of the changes made to the application by this Amendment.

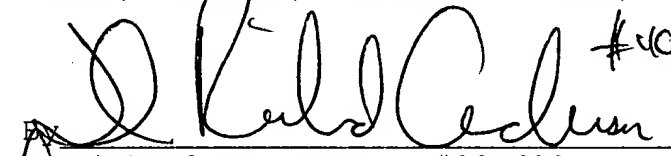
Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned at telephone number (703) 205-

8000, which is located in the Washington, DC area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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Attachment: Version with Markings to Show Changes Made
Letter Requesting Initialed PTO 1449 Form
Drawing Correction Authorization Request

VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE SPECIFICATION:

The paragraph under the heading "2. Description of the Related Art" on page 1 of the specification has been rewritten as follows:

--Fig. 29 shows one of tag types which are elements of a profile for describing a color characteristic disclosed in, for example, "ICC Profile Format Specification, Version 3.3, November 11, 1996, International Color Consortium". Referring to Fig. [31]29, bytes 0 to 3 are identifiers, 4 to 7 are reserved bytes, 8 is the number of input channels, 9 is the number of output channels, 10 is the number of grid points in multidimensional lookup table to be described later, 11 is a reserved byte for padding, 12 to 15, 16 to 19, 20 to 23, 24 to 27, 28 to 31, 32 to 35, 36 to 39, 40 to 43 and 44 to 47 are encoded parameters e_{ij} ($i, j = 0$ to 2), 48 to m are input one dimensional tables, $m + 1$ to n are n -dimensional m bytes (n is the number of input channels and m is the number of output channels). The above-mentioned table is also called a multidimensional lookup table. Note that $n + 1$ to o is an output one-dimensional lookup table.--